

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**KELLY PINN, individually and on §
behalf of all others similarly situated, §**

Plaintiff,

V.

**HUFSEY HOME SERVICES, INC.
D/B/A ONE HOUR AIR
CONDITIONING & HEATING, and 33
MILE RADIUS LLC D/B/A
EVERCONNECT,**

Defendants.

Civil Action No. 4:23-cv-01208-Y

**DEFENDANT 33 MILE RADIUS LLC’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

Defendant 33 Mile Radius LLC hereby moves for a 30-day extension of time within which to respond to the Complaint in this putative class action lawsuit. Plaintiff does not oppose this request.

1. Plaintiff commenced this putative nationwide class action by filing her Complaint on December 1, 2023. Defendant received service of the Complaint on December 5, 2023.

2. Under Federal Rule of Civil Procedure 12(1)(1)(A)(i), Defendant has until December 26, 2023, to answer or otherwise respond to the Complaint.

3. Given the numerous factual and legal issues presented by Plaintiffs' allegations and claims, as well as Defendant's response deadline falling the day after Christmas, counsel for Defendant has conferred with counsel for Plaintiff regarding this Motion and requested a 30-day extension of time, or until January 25, 2024, for Defendant to answer or otherwise respond to the Complaint. Counsel for Plaintiff indicated that they are not opposed to the request. In agreeing to

this extension, Plaintiff does not waive any claim for relief.

4. This is Defendant 33 Mile Radius, LLC's first request for an extension of time. This request is not being made for the purpose of delay and will not affect any other dates in this case.

For the foregoing reasons, Defendant 33 Mile Radius, LLC hereby requests that the Court grant this Motion and allow Defendant 33 Mile Radius until January 25, 2024, to answer or otherwise respond to the Complaint.

Dated: December 13, 2023

Respectfully Submitted,

GREENBERG TRAURIG LLP

/s/Christopher S. Dodrill

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**ATTORNEYS FOR DEFENDANT
33 MILE RADIUS LLC**

CERTIFICATE OF CONFERENCE

I certify that on December 13, 2023, counsel for Defendant conferred via e-mail with counsel for Plaintiffs regarding the relief requested herein. Counsel for Plaintiff indicated that he is unopposed to the requested extension of time.

/s/Christopher S. Dodrill

Christopher S. Dodrill

CERTIFICATE OF SERVICE

This certifies that on this 13th day of December, 2023, a true and correct copy of the foregoing has been served on all counsel of record by the Court's CM/ECF system.

/s/Christopher S. Dodrill

Christopher S. Dodrill